IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

UNITED SERVICES AUTOMOBILE

ASSOCIATION,

Plaintiff, Counterclaim Defendant,

v.

Civil Action No. 2:22-cv-00291

TRUIST BANK,

Defendant, Counterclaim Plaintiff.

Bank,

Service Services AUTOMOBILE

Service AUTOMOBILE

Service Services AUTOMOBILE

Service AUTOMOBILE

S

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff United Services Automobile Association ("Plaintiff" or "USAA") and Defendant Truist Bank ("Defendant" or "Truist") jointly file this Unopposed Motion to Stay All Deadlines and Notice of Settlement and respectfully move this Court to stay all unreached deadlines for thirty (30) days.

Plaintiff and Defendant hereby notify the Court that all matters in controversy between the parties have been resolved, in principle, and the parties respectfully request that the Court stay all unreached deadlines contained in the Court's Docket Control Order (Dkt. 43) for thirty (30) days so that the agreement can be finalized, and appropriate dismissal papers submitted.

Respectfully submitted,

Dated: October 5, 2023

/s/ Robert Christopher Bunt

Jason G. Sheasby (CA #205455) ($Pro\ Hac\ Vice$)

Lead Attorney

Lisa S. Glasser (CA #223406) (Pro Hac Vice)

Rebecca L. Carson (CA #254105) (Pro Hac

Vice)

Stephen M. Payne (CA#310567) (Pro Hac Vice)

IRELL & MANELLA LLP

1800 Avenue of the Stars, Suite 900

Los Angeles, California 90067

Tel.: (310) 203-7096

Fax: (310) 203-7199

jsheasby@irell.com

lglasser@irell.com

rcarson@irell.com

spayne@irell.com

Robert Christopher Bunt

PARKER, BUNT & AINSWORTH, P.C.

Texas State Bar No. 00787165

100 E. Ferguson Suite 418

Tyler, Texas 75702

Tel.: (903) 531-3535

rcbunt@pbatyler.com

ATTORNEYS FOR PLAINTIFF UNITED SERVICES AUTOMOBILE ASSOCIATION

/s/ Lionel M. Lavenue (with permission)

Lionel M. Lavenue

Virginia Bar No. 49,005

Elliot C. Cook

Bradford Schulz

Finnegan, Henderson, Farabow,

Garrett & Dunner, LLP

1875 Explorer St., Suite 800

Reston, VA 20190

(571) 203-2700

lionel.lavenue@finnegan.com

elliot.cook@finnegan.com

bradford.schulz@finnegan.com

Kara A. Specht Georgia Bar No. 881687 Finnegan, Henderson, Farabow, Garrett & Dunner, LLP 271 17th Street, NW, Suite 1400 Atlanta, GA 30363-6209 (404) 653-6400 kara.specht@finnegan.com

Cara E. Regan (pro hac vice)
Finnegan, Henderson, Farabow,
Garrett & Dunner, LLP
901 New York Ave., NW
Washington, D.C. 20001
Phone: (202) 408-4000
Fax: (202) 408-400
cara.regan@finnegan.com

David R. Marriott (pro hac vice)
Sharonmoyee Goswami (pro hac vice)
Michael Addis (pro hac vice)
Daniel Slifkin (pro hac vice)
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, NY 10019
(212) 474-1000
dmarriott@cravath.com
sgoswami@cravath.com
maddis@cravath.com
dslifkin@cravath.com

Deron R Dacus The Dacus Firm, PC 821 ESE Loop 323 Suite 430 Tyler, TX 75701 903/705-1117 ddacus@dacusfirm.com

Attorneys for Defendant Truist Bank

CERTIFICATE OF CONFERENCE

On October 5, 2023, pursuant to Local Rule CV-7(h), counsel for Plaintiff met and conferred with counsel for Defendant, and counsel for Defendant advised that they do not oppose and that they agree with the filing of this motion and the attached proposed order.

/s/ Robert Christopher Bunt
Robert Christopher Bunt

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Robert Christopher Bunt
Robert Christopher Bunt